

aptem.

Intelligent technology®

Using Aptem to prepare for an ESFA Audit





Contents

The ESFA Audit	3
Preparation is key	4
The role of Aptem	5
Eligibility checks when onboarding a learner	6
Compliance documentation	9
ILR (Individual Learner Record)	10
The importance of a detailed Training Plan	12
Gaps in active learning	12
OTJ (off-the-job) hours	13
Reviews	14
EPA (End Point Assessment)	15
Registering and tracking certification	16
Reporting	17
Additional information and support	19

The ESFA Audit



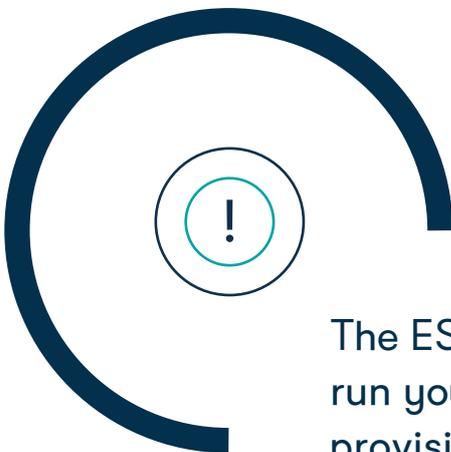
Successful ESFA Audits rely on training providers being confident about the accuracy of their funding claim and being able to back up decisions with robust evidence. The agency is purely interested in the data, the funding, and your evidence to support the funding claim. The ILR data that providers submit on a monthly basis is critical to this.

The ESFA is less interested in how you run your business or the quality of your provision. They are there to corroborate the funding claim.

The ESFA reviews on a sample basis as well as a wider data review of the Provider Data Self-Assessment Toolkit (PDSATs). They also consider other areas of compliance such as sub-contracting requirements. Where specific learner data doesn't make sense, auditors may raise direct queries.

The ESFA reports on non-compliance only. The fewer management recommendations an auditor makes, the better. As a guide, 2–3 means you are doing well, 10–20 is reasonable, 20+ means some serious problems.

At the end of the review, the ESFA issues a management letter detailing the issues identified. An error rate of 5% or more from the sample equates to an 'unsatisfactory' rating. That means you are further up the risk ladder and could be audited again the following year.



The ESFA is less interested in how you run your business or the quality of your provision. They are there to corroborate the funding claim.

Preparation is key



The ESFA review will cover the following:

- ✓ Learner eligibility
- ✓ National minimum wage
- ✓ Redundancy
- ✓ Contracted hours
- ✓ Negotiated price
- ✓ English and maths requirements
- ✓ Initial assessment and prior learning
- ✓ Delivery location (50% of time in England)
- ✓ Off-the-job calculation
- ✓ Off-the-job planning
- ✓ Off-the-job delivery and completion
- ✓ Learning Support – assessment and delivery
- ✓ ILR data and core documentation
- ✓ Apprenticeship Agreement
- ✓ Training Plan
- ✓ Evidence of first day of learning
- ✓ Learning activity
- ✓ End date
- ✓ Co-investment and payment over funding band maximum
- ✓ Additional payments
- ✓ Small employer waiver
- ✓ EPAO contracts, payments and Gateway assessment

It's worth having a dry run ahead of the actual audit. You could form your own internal audit team to cast a critical eye over your claim and help you prepare. Or if you want external support, there are a number of providers you can engage, including PwC and RSM UK.

Focus on outputs and eligibility when preparing a pack:

 Training Plan – at the very least the first one and the final one, but ideally all Training Plans issued as a result of a major change e.g., break in learning or change of employer.

 Off-the-job hours.

 All eligibility evidence gathered during onboarding, including initial assessment.

You can either prepare a pack of downloaded information for your auditor or give them access to your apprenticeship management system, with permissions to view certain files. If you choose to give your auditor access to Aptem, it's worth going through the filter options with the auditor as there are several helpful options to get to different subsets of data.



The role of Aptem

Clearly your apprenticeship management system, as your central repository of information, has a large part to play in an ESFA Audit.

Aptem has been built to support you. This guide will walk you through where to find the information you will need to avoid the common pitfalls.





Eligibility checks when onboarding a learner

There are various things a learner needs to complete and provide before they can be considered eligible for an apprenticeship programme:

- ✓ Signed apprenticeship agreement
- ✓ Signed Training Plan
- ✓ Eligibility review
- ✓ Completion of data required for ILR
- ✓ Identity checks
- ✓ Evidence of completion of functional skills assessments in English and maths
- ✓ Evidence of completion or exemption from qualifications mandated by the standard
- ✓ Justification, plan and delivery of additional support if it is claimed
- ✓ Evidence of relevant prior learning and adjustments made to learning plan and funding
- ✓ Evidence of accurate capture of starting points through Initial Needs Assessment (Skills Radar completion within Aptem)

In Aptem this is a streamlined process, captured within the Onboarding part of the system. Learners are not able to pass through to a delivery programme and start learning until this has been completed and approved by the Training Provider. Providers present documents they want the learner to read, and Aptem forces acknowledgement of the contents.

While learners are asked to submit all the information required across all forms/ILR, in Aptem they do this only once, and the system pulls it across the various documents. Learner fields become locked once they are saved, and only an administrator can unlock them. This preserves the integrity of the information captured.

Common pitfalls that the ESFA regularly sees include:

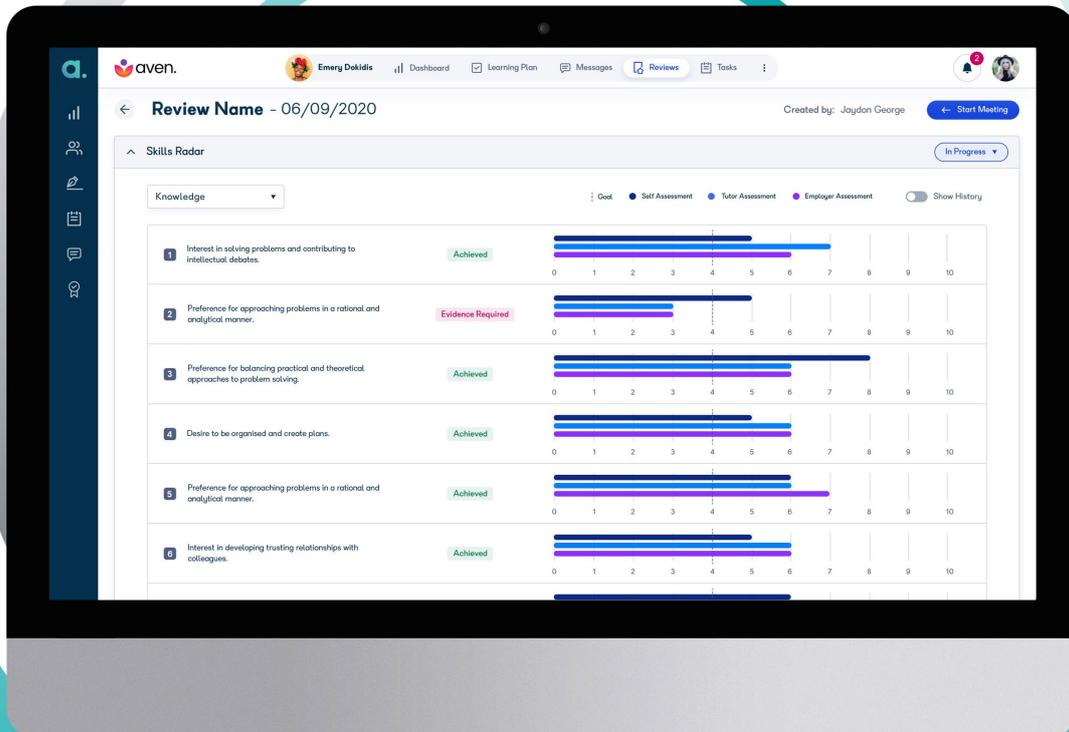
- Written agreements not signed
- Negotiated price on the ILR not reconciling to the agreed price on the written agreement
- Results of initial assessment (Skills Radar) not being considered

These risks are greatly reduced by the sequential system processes within Aptem's onboarding.

The Initial Assessment is called a Skills Radar in Aptem, and this is where all three interested parties – the learner, coach and employer – have the opportunity to assess the learner's starting points against the knowledge, skills and behaviours (KSBs) within the apprenticeship programme.

Capturing accurate starting points is essential to demonstrate progress over time.

Aptem is one of the only systems that allows all three parties to input scores, to determine a much higher level of accuracy. In other systems this tends to be done by the coach only, in consultation with the learner within a short initial meeting.





The Skills Radar in Aptem is both customisable and clearly mapped to the standard, removing the risk of vague questions that are red flags to the ESFA.

The ESFA will expect to see that the outcomes of the assessment have been considered in the negotiated price, content and duration of the apprenticeship. Issues such as contradictory high scoring on a Skills Radar and full funding band claims are increasingly prevalent. Providers should record the narrative and rationale behind the funding claim – has the industry moved on? Is a re-teach required? Auditors need to see clear documentation to support why the specific price is being claimed, including a breakdown – which is now a requirement. In Aptem this can be done in the Eligibility Review Prior Learning section, which then flows into the Training Plan.

Aptem provides a free and embedded Recognition of Prior Learning (RPL) calculator to recommend reductions to the price and, where applicable, the duration.

Once the learner has completed onboarding, the training provider has access to a PDF review document capturing all information submitted by the learner to review manually, checking things like date matching and ensuring everything is signed. This is date- and time-stamped by the reviewer, and the learner is moved to a status: Ready to Enrol (where they are moved to a delivery programme), Under Review (for someone else to take a look at the file), or Non-starter (not eligible but keeping information on system). Aptem also has an additional safeguarding step where it re-presents the information for the learner to check at the start of their delivery programme.

Importantly, Aptem allows for custom fields within the application process through the extended ILR, so if a provider wants to ensure learners cannot progress to the next step without completing certain information, they can do this.



Compliance documentation

All compliance documents are stored in the learner's documents section, within their profile, along with supporting evidence like certificates of prior achievement.

The Apprenticeship Agreement is the document that legally recognises the apprentice, and the guarantees that go with that status. There is no requirement for the provider to sign it (just the employer and apprentice). However, it's a legal requirement that training providers have it. Section P27.3 of the funding rules says, "If the Apprenticeship Agreement is incomplete and/or does not meet the statutory requirements the individual will not have a valid agreement and will not be eligible to receive funding." Any missing, incomplete or late signed Apprenticeship Agreements may be treated as funding errors depending on the circumstances. This, in practice, could mean no Apprenticeship Agreement, and therefore no money.

In Aptem, the Apprenticeship Agreement is available as a template and is a formalised part of the onboarding process. A learner cannot pass through to a delivery programme – where the learning starts – until there is a fully signed agreement that has been verified by the training provider.

The Training Plan (formerly the Commitment Statement) also exists as a template within Aptem to populate, sign and store against the learner record, and is also embedded within the onboarding phase.



Providers with larger learner numbers, or aspirations to have larger learner numbers, are advised to use a purpose-built Management Information system such as Aptem.



ILR (Individual Learner Record)

The ILR is a record of the learner's details and their learning programme. It is an essential aspect of apprenticeship compliance. Training providers are required to submit an ILR monthly to the ESFA via the Submit Learner Data service in order to receive funding for learners on programme.

The ILR is more than an 'invoice for funding'. It is used to:

- ✓ Calculate actual funding earned
- ✓ Monitor at an individual level, all training providers' delivery against allocation or contract
- ✓ Monitor quality of provision and evaluate the effectiveness of training providers across the learning and skills sector
- ✓ Make the case to government for levels of funding appropriate to the sector
- ✓ Monitor progress against government targets
- ✓ Demonstrate the outcomes of the distribution of government funds

ILR management is time-consuming and complex, and becomes more so as the organisation's learner numbers grow.

The depth and breadth of the information that needs to be recorded for each learner is significant. For organisations training 500 learners or fewer, the government provides a free ILR Learner Entry Tool. However, providers with larger learner numbers, or aspirations to have larger learner numbers, are advised to use a purpose-built Management Information system. This ensures the correct data is collected and submitted.



The ILR functionality is incredibly invaluable. This flexible system saves us considerable time and effort and delivers a high level of insight.

Ruth Eccles, University of Nottingham



For organisations training 500 learners or fewer, the government provides a free ILR Learner Entry Tool.

The ESFA checks all ILR data upon submission, and if errors are found, it will require the training provider to check, correct and return the data. However, there isn't much time allowed for this process to happen. The submission window opens around mid-month and continues up to the fourth working day of the next month. Providers can use FIS (Funding Information Service) at any point to check the data. Any delays in this process can result in delays to the receipt of funding.

Aptem allows you to easily extract information on all learners for your monthly ILR submission, and safeguards against contradictory information to reduce the likelihood of errors. A number of our providers extract their ILR in advance for learners in the previous month and run this through FIS or the Learner Data Service (if it's open) to identify and correct errors. Providing you are up to date with your ILR submission you won't need to update historic

data already submitted, so extracting for the previous month only will be sufficient.

When you upload your data to the Learner Data Service it's worth checking errors and warnings, even if you've already run it through FIS, before submitting it, just to make sure it doesn't pick anything else up. The Learner Data Service is the most up-to-date source. If you do use FIS, make sure you have the most up-to-date version. It's important to be aware of what the FIS does and does not check. For example, rules that rely on external tables such as postcode or Unique Learner Number tables [are not included in the FIS](#) and will need to be checked separately.

The ESFA often sees the wrong price recorded on the ILR, leading to under and over claims, so make sure you check this.

A summary of your ILR information is available in the Compliance Dashboard within Aptem.





The importance of a detailed Training Plan

The Training Plan (referred to as a Learning Plan within Aptem) tracks the progress of your learner against their programme and its components. The Learning Plan contains all the activities, digital learning assets, meetings and webinars that the learner needs to complete.

Plan activity even in downtime or holiday periods (especially if you are a provider operating within a traditional academic year). The ESFA doesn't stipulate how much activity needs to take place in holiday periods, so it could be an hour here and there.

In Aptem, your Learning Plan and Dashboards help you to set and track your planned hours against activities. Aptem automatically calculates planned and minimum hours at enrolment. The Performance Dashboard records hours for each learner on programme and monitors their progress against planned hours.

You can pre-map learning plan activities to standards and qualifications within Aptem. Evidence is then mapped to KSBs within the Learning Plan. The evidence summary tab displays evidence and how it has been mapped to both the standard and the KSBs.

It is possible within Aptem to lock the Learning Plan if a learner has not signed required documents.



Gaps in active learning

Auditors will identify learners who have breached the active learning funding rules. You will need to provide an explanation for this activity and evidence of engagement.

The Caseload Dashboard within Aptem is something a tutor or admin team can log into daily to see the tasks they need to complete to maintain compliance, complete marking, see learners ready for EPA, identify learners who need support and identify any early red flags. The filters can be used to analyse tutors, learners, or activity type.

If you do need to put a learner on a Break in Learning or Return to Learning, trackers within Aptem automatically capture and manage this, updating the ILR, with an audit history of changes. There are a number of useful trackers within Aptem that automatically do the heavy lifting from an admin perspective should a learner have a change in circumstance, employer, details, programme etc. The trackers automatically update the ILR and can generate new versions of some documents. Some trackers are not designed to do this and you can check which documents have been regenerated in the documents section of the learner area, and manually regenerate those missing.



OTJ (off-the-job) hours

Most providers who fail audit do so because of off-the-job training hours. You must plan sufficient hours in the Learning Plan, and ideally plan to exceed the number of OTJ hours. Your Training Plan needs to reflect this.

The ESFA review is looking for four components:

- ✓ Has the 20% requirement (capped at six hours per week for a full-time apprentice) been quantified?
- ✓ Has active learning been planned in every calendar month? Providers should demonstrate that they have planned the hours needed based on the initial assessment.
- ✓ Is there evidence of progress against the 20% requirement?
- ✓ Is there evidence that at least 20% off-the-job activity has been undertaken on completion?

And 20% does mean 20%. Auditors will not care that learners have a first-class degree if they completed only 18.8% of their off-the-job hours between the start date and end date (i.e. practical period). If the off-the-job hours are not met, the full cost of the programme (not just the audit year) will be clawed back. This is even more significant when looking at higher-level apprenticeships that tend to be longer and more expensive.

And remember – Functional Skills training does not count as off-the-job hours.

The Performance Dashboard within Aptem flags where there are insufficient hours planned, and you can drill down in the dashboard to see the source of these figures (also available in the Caseload Dashboard). At this point, providers will need to review their Learning Plan and adjust accordingly to maintain compliance. Remember, the off-the-job requirement is 20% of normal working hours, but some programmes will ideally include more planned hours.

Use the Performance Dashboard to ensure the 20% has been completed before putting an apprentice forward for Gateway.

'Beyond planned end date' learners must continue to evidence training at a minimum of six hours per week. It is better to keep on top of your learner's activity via the Aptem dashboards and introduce Breaks in Learning (BiL) where appropriate if there is no active learning, or support them if they are falling behind, than move the planned end date into 'out of funding'.

Aptem tracks and evidences participation and progress throughout the delivery programme against the requirement. If a learner withdraws you will be able to evidence how much has been completed up to the point of withdrawal. Aptem also captures and stores layers of detail about the detailed reasons for withdrawal that help to fully explain the learner journey.



Reviews



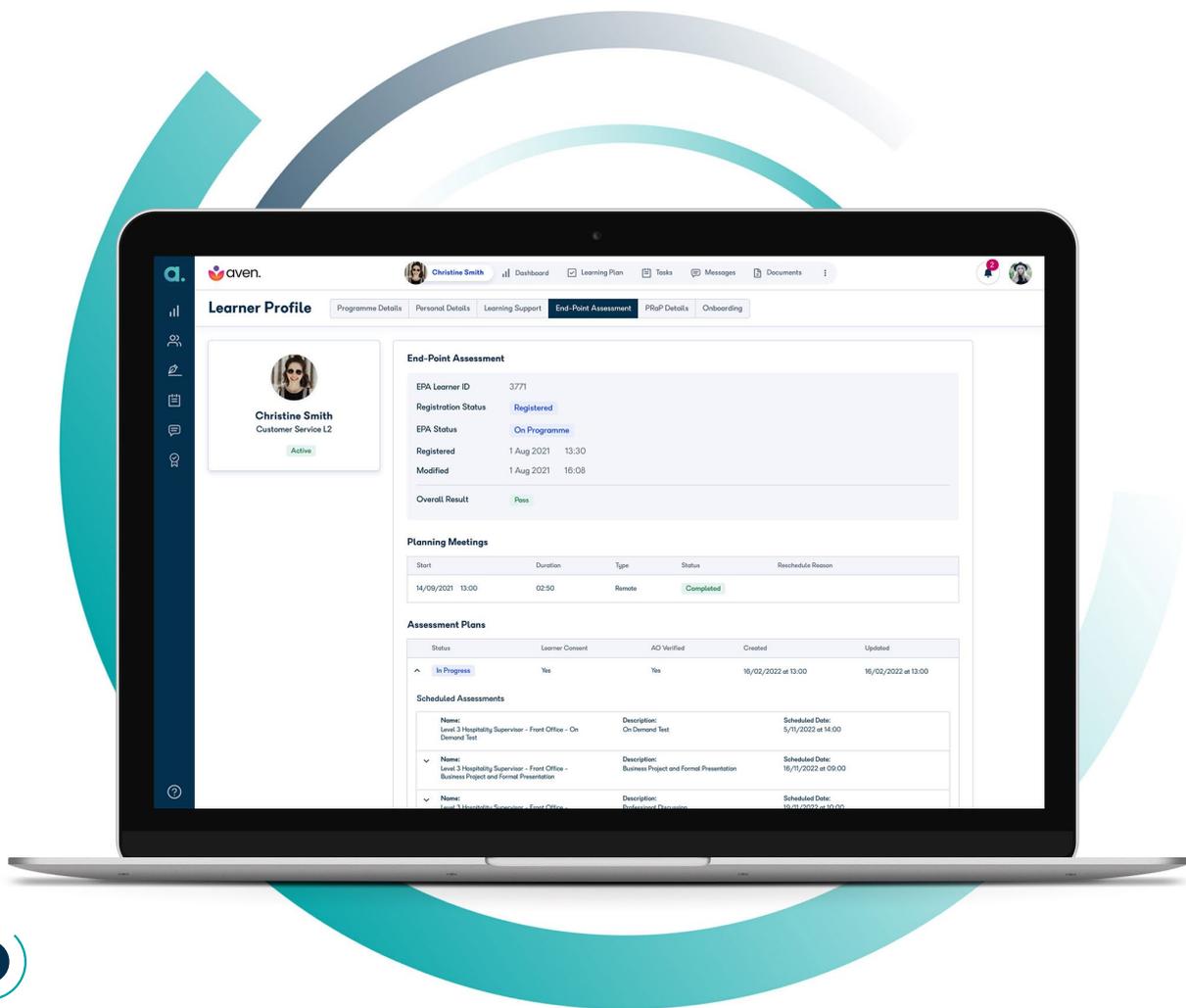
Eligibility review: This takes place during the onboarding phase before a learner starts on a programme. Its purpose, as the name suggests, is to ensure a learner is eligible for a particular apprenticeship programme and that the employer is aware of their commitments throughout the programme. During or after the review, all three parties should sign an agreement. In Aptem this PDF is generated and e-signed.



Progress reviews (often referred to as Tripartite reviews): These reviews should happen at least four times a year, and ideally every 12 weeks. They take place with a coach, a learner and an employer. Progress reviews are sometimes seen as 'admin tick box' exercises if you don't have a system like Aptem that enables you to complete all the admin tasks in advance, allowing for the review to be future and learner focused. Compliance experts recommend always having a review at the start of a new academic year, if you operate your programmes by academic years. If you have Aptem's Zoom integration, reviews can take place via Zoom and the audio recording and transcript is stored within Aptem for audit purposes.



Gateway review: the End Point Assessment Gateway Review serves as a quality assurance measure to ensure that apprentices are fully prepared for their final assessment and are ready to demonstrate their skills and knowledge in the workplace. In Aptem the Gateway review is a three-way review. This review must be personalised to the requirements of the standard, and this is done during programme implementation phase. As part of the review, the Tutor, Learner and Employer will check that functional skills and maths and English have been completed (these are automatically pulled through from the BKSB or Skills Forward assessments that took place during onboarding). GCSE certificates in maths and English also automatically pull through. An employer declaration could be added as this is a very common gateway requirement. Check the Learning progress tile to ensure the learner has done everything they need to do to complete their apprenticeship. At the end of this review there is a three-way checkbox for all three parties to contribute to, and a checklist of compliance requirements. The final stage within Aptem is to move the Programme Status to 'Entered EPA'. Once this is submitted, a saved and auditable copy is available within Aptem for the ESFA to review.



EPA (End Point Assessment)



Training providers are expected to engage with independent assessment organisations approved by the ESFA to deliver the EPA. Training providers are responsible for monitoring the progress of apprentices, including their readiness for EPA. They are expected to provide guidance and support throughout EPA, ensuring that the apprentice can demonstrate the necessary KSBs aligned with the apprenticeship standard and Training Plan. Training providers are expected to adhere to QA processes established by the ESFA, which include monitoring the quality of the EPA.

Aptem is integrated with EPAPro to help you more easily manage the End Point Assessment process for apprenticeship learners. Information is seamlessly shared between the two systems, with Aptem registering the learner and ensuring the learner information is kept up to date, including all changes of circumstances.



Aptem is integrated with EPAPro to help you more easily manage the End Point Assessment process for apprenticeship learners.



Registering and tracking certification

Aptem offers a database for training providers to track the process of registration and certification, and also assessment.

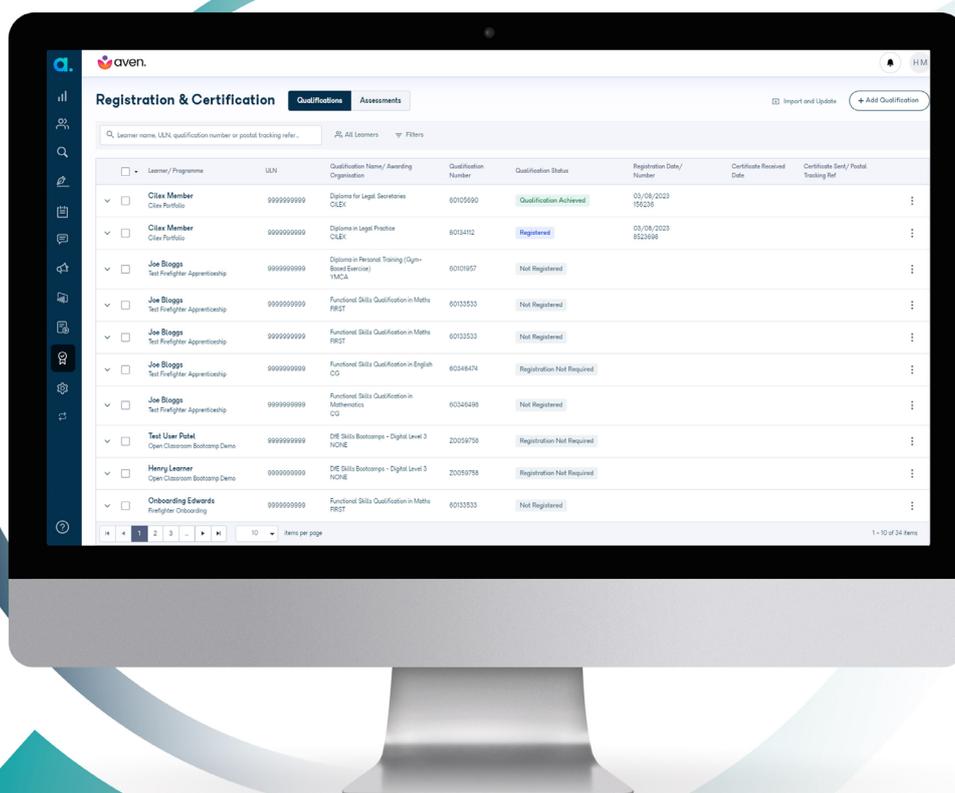
You can mark a learner as 'Registered' in the Certification section, at the beginning of a programme, or when you deem appropriate (as there is a charge from the awarding body to do so).

This can be done in bulk using a CSV file. It tracks when you have registered learners with their awarding body and when you have sent the certificates out.

We recommend you scan and upload the certificate into Aptem so you have a record of it and a copy you can send to the learner should it go astray.

You can see under a learner profile the history of their assessment for each part of their overall programme e.g. functional skills elements. You can do assessment upload in bulk via a CSV file.

A completion of programme tracker closes everything down for the learner and updates the ILR. 'The ESFA will issue the 20% completion payment as long as the learner passes their end point assessment, achieving their apprenticeship.





Reporting

There are a number of embedded dashboards within Aptem that can provide valuable information and evidence for your ESFA Audit. You can give your auditor access to these dashboards if you give them access to the system. You can also set permissions on these dashboards so that they are always monitored by relevant and accountable people in your organisation. Data can be drilled down to individual level.

The Financial Dashboard indicates the funding due to you from the ESFA for learners completing programmes, and year-to-date figures. It also displays forthcoming claim periods, showing what you are planning to submit to the ESFA. 'It gives a high-level breakdown of the components that make up each learner's funding claim, e.g. functional skills, or Additional Learning Support (ALS) requirements.

The Compliance Dashboard provides an overview of how compliant your learners are and where there are gaps that can affect ESFA funding. You can drill down to see things like gaps in compliance documentation signatures.

The Caseload Dashboards gives you an overview of each of your coaches' learners. It provides the key metrics to ensure that each learner is being seen and progressed, identifying learners who may need additional assistance to achieve to the best of their abilities in a timely manner.

The Quality Dashboard provides indicative QAR calculations for apprenticeship learners based on the ILR data within your Aptem account. The QAR dashboard displays three years of data and gives you the minimum learners you have passed already in year, your expected and your maximum – if everyone you expect to pass in that year passes.

The Quality Dashboard also contains an Accountability page, which provides headline Accountability metrics that align with the Apprenticeship Provider Accountability Framework. It displays metrics for the current year.

Tutor, learner, employer and organisational performance dashboards all display OTJ hours – target hours, minimum requirement hours, planned hours, completed hours, submitted hours and forecast hours, to help you to remain compliant.

As part of your ESFA Audit you may wish to create bespoke reports. You can do this within Aptem using the User Generated Reports (UGR) extract tool. You have the option of sharing these with other Aptem users or outputting them as an Excel file or PDF. Providers tend to use UGR to output reports on onboarding and the detail within onboarding programmes, or functional skills exception reports.



Aptem proved to be an invaluable asset during our recent ESFA audit, providing a seamless experience from start to finish. Its intuitive layout facilitated smooth navigation for our auditor, while the integration of the ILR within Aptem significantly streamlined our processes. Accessing data and generating reports was a breeze, alleviating any unnecessary stress. Additionally, the responsive help desk promptly addressed any issues encountered, further enhancing our satisfaction with Aptem's performance.

Edd Belshaw, Group Apprenticeship Coordinator
WEC Group

Additional information and support

The Aptem Help Centre contains a myriad of useful articles and videos on how to set up your Aptem tenant to help you prepare for an ESFA Audit, and where to find the information you need.

Here is a summary of some of the most useful resources:

- [Planning for QA](#)
- [Carrying out the QA process](#)
- [Generating an ILR batch file for upload to ESFA](#)
- [Performance Dashboard – Off the Job Hours drilldowns](#)
- [Creating a tracker](#)

If you do require additional assistance your Customer Success Manager and the Aptem Support Team are on hand.

If you are an organisation that helps deliver further education and employment programmes and would like to transform the way you deliver these in a cost-effective, efficient and compliant way, get in touch:

enquiries@aptem.co.uk

020 3758 8540

Aptem is one of the fastest-growing SaaS companies to manage vocational training, skills and employability programmes. We offer a range of solutions to support the development of vocational skills and re-employment.

- ✓ **Aptem Apprentice**, a highly customisable system which helps providers to deliver compliant apprenticeship training.
- ✓ **Aptem Enrol**, remote onboarding of apprenticeship students, for colleges and universities.
- ✓ **Aptem Employ**, a unique, flexible, award-winning employability system that helps to get people back into the workplace quickly and for the long term.
- ✓ **Aptem Skills**, our award-winning end-to-end delivery platform that enables fully compliant AEB course delivery and accelerates re-employment.
- ✓ **Aptem Commercial**, a complete solution to managing course applications, admissions, payment and reporting. It gives you full transparency across your commercial, short course or CPD offering.
- ✓ **Aptem Assess**, a cognitive assessment tool that enables you to seamlessly identify and respond to learning needs.



Follow us on LinkedIn and X